



*United States Attorney  
Southern District of New York*

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July 9, 2019

**BY ECF**

The Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *United States v. Stephen M. Calk, 19 Cr. 366 (LGS)*

Dear Judge Schofield:

The Government writes, with the consent of defense counsel, to respectfully request the exclusion of time under the Speedy Trial Act until August 26, 2019, the current deadline for the Government to complete its production of discovery.

The Government respectfully requests that time be excluded in the interests of justice pursuant to 18 U.S.C. § 3161(h)(7)(A) in order to allow the Government to continue making discovery productions,<sup>1</sup> and to allow the defense to review the Government's discovery productions and evaluate potential motions.<sup>2</sup> This Court, by order dated May 29, 2019 (Dkt. 11), previously excluded time until July 11, 2019, which was then set as a conference date.<sup>3</sup>

The parties anticipate that on or before August 26, 2019, they will be in a position to propose to the Court their positions on a schedule for further proceedings in this case and availability for trial.

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<sup>1</sup> The Government has to date produced in excess of 314,000 pages of discovery.

<sup>2</sup> The time for the defendant to file promotion letters in advance of any motion directed at the sufficiency of the indictment has already elapsed, *see* Dkt. 19, but no schedule has yet been set for the filing of other motions.

<sup>3</sup> Prior to this exclusion, the Magistrate Judge Debra Freeman had excluded time from May 23, 2019 past May 29, 2019.

We thank you for your consideration of this request.

Respectfully submitted,

AUDREY STRAUSS  
Attorney for the United States  
Acting Under Authority Conferred by  
28 U.S.C. § 515

by: /s/ Paul M. Monteleoni

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